



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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May 12, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government respectfully submits this letter in response to the Court's Order dated May 10, 2021, which directed the Government to propose and justify any requests for redaction of the defendant's memorandum in support of her supplemental pre-trial motions and exhibits. (Dkt. No. 274).

After reviewing the defense's memorandum, the Government seeks a limited number of redactions. These proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the defense's memorandum in support of her supplemental pre-trial motions is a judicial document subject to the common law presumption of access, the proposed redactions are narrowly tailored to protect the privacy interests of victims and third parties referenced in the document. These redactions are thus consistent with similar, tailored redactions permitted by the Court in this case to protect the privacy interests of third parties. (*See, e.g.*, Dkt. No. 168, 232). Today the Government is submitting to the Court by email its proposed redactions to the defense's memorandum, which the Government respectfully requests be filed under seal.

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The Government respectfully submits that Exhibits C, E, F, G, H, and I should be filed entirely under seal in order to protect the privacy interests of victims and third parties implicated in the documents. The Court has accepted similar exhibits under seal in this case to protect such privacy interests. (*See, e.g.*, Dkt. No. 168, 232).

Respectfully submitted,

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Cc: Defense counsel (By ECF)